

# EXHIBIT “H”

**From:** [Corby Vowell](#)  
**To:** [Aamir Kazi](#); [Susana M. Ricardo](#); [Jon Suder](#); [Mike Cooke](#); [Rich Wojcio](#); [bfarnan@farnanlaw.com](mailto:bfarnan@farnanlaw.com); [Christopher O. Green](#); [Susan Morrison](#); [Michael J. Farnan](#)  
**Cc:** [McAfee/Kajeet](#)  
**Subject:** RE: Kajeet v. McAfee - Service of Discovery  
**Date:** Wednesday, September 1, 2021 5:58:00 PM

---

Aamir,

In our meet and confer yesterday, August 31, 2021, we discussed the scope of the Requests for Production Nos. 6-8-17-18, 29, 32, 40, and 47 to clarify for McAfee the categories of documents that Kajeet is seeking. You indicated that, based on the clarifications, you would go back and request responsive documents from McAfee.

We also discussed the timing of McAfee's production of documents for the other requests which McAfee indicated it would produce documents. You stated that McAfee would not be producing responsive documents this week or next week and that the bulk of McAfee's production would likely be made in approximately 4-6 weeks.

In addition, we discussed McAfee's response to Kajeet's Interrogatory No. 1 related to its non-infringement positions and Kajeet's position that McAfee needed to identify specific portions of the source code that are relevant to Interrogatory No. 1. You stated that McAfee would not identify any specific portions of the code.

We look forward to receiving McAfee's document production.

Thanks,

Corby

---